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LLŶR FLOATING OFFSHORE WIND PROJECT

Llŷr 1 Floating Offshore Wind Farm

Environmental Statement

Volume 6: Appendix 8F – Green Infrastructure Statement

August 2024

Prepared by: Llŷr Floating Wind Ltd

FLOVENTIS ENERGY

Document Status

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Acronyms and abbreviations

Acronym or abbreviation	Definition	Acronym or abbreviation	Definition
BwNSF	Building with Nature Standards Framework	PEA	Preliminary Ecological Appraisal
CRoW	Countryside and Rights of Way Act	PCC	Pembrokeshire County Council
CHSR	Conservation of Habitats and Species Regulations	PPW	Planning Policy Wales
DECCA	Diversity, Extent, Condition, Connectivity and Aspects	PRoW	Public Rights of Way
INNPS	Invasive Non-Native Plant Species	SAC	Special Area of Conservation
LBAP	Local Biodiversity Action Plan	SPA	Special Protection Area
MLT	Marine Licensing Team	SuDS	Sustainable Drainage System
MLWS	Mean Low Water Springs	SSSI	Site of Special Scientific Interest
NBB	Net Benefits for Biodiversity	TANS	Technical Advice Notes
NRW	Natural Resources Wales	TJB	Transition Joint Bays
OfECC	Offshore Export Cable Corridor	WCA	Wildlife and Countryside Act
OnECC	Onshore Export Cable Corridor		

Glossary of project terms

Term	Definition
The Applicant	The developer of the Project, Llŷr Floating Wind Ltd.
Array	All wind turbine generators, inter array cables, mooring lines, floating sub-structures and supporting subsea infrastructure within the Array Area, as defined, when considered collectively, excluding the offshore export cable(s).
Array Area	The area within which the wind turbine generators, inter array cables, mooring lines, floating sub-structures and supporting subsea infrastructure will be located.
Floventis Energy	A joint venture company between Cierco Ltd and SBM Offshore Ltd of which Llŷr Floating Wind Limited is a wholly owned subsidiary.
Landfall	The location where the offshore export cable(s) from the Array Area, as defined, are brought onshore and connected to the onshore export cables (as defined) via the transition joint bays (TJB).

Term	Definition
Llŷr 1	The proposed Project, for which the Applicant is applying for Section 36 and Marine Licence consents. Including all offshore and onshore infrastructure and activities, and all project phases.
Marine Licence	A licence required under the Marine and Coastal Access Act 2009 for marine works which is administered by Natural Resources Wales (NRW) Marine Licensing Team (MLT) on behalf of the Welsh Ministers.
Offshore Development Area	The footprint of the offshore infrastructure and associated temporary works, comprised of the Array Area and the Offshore Export Cable Corridor, as defined, that forms the offshore boundary for the S36 Consent and Marine Licence application.
Offshore Export Cable	The cable(s) that transmit electricity produced by the WTGs to landfall.
Offshore Export Cable Corridor (OfECC)	The area within which the offshore export cable circuit(s) will be located, from the Array Area to the Landfall.
Onshore Development Area	The footprint of the onshore infrastructure and associated temporary works, comprised of the Onshore Export Cable Corridor and the Onshore Substation, as defined, and including new access routes and visibility splays, that forms the onshore boundary for the planning application.
Onshore Export Cable(s)	The cable(s) that transmit electricity from the landfall to the onshore substation.
Onshore Export Cable Corridor (OnECC)	The area within which the onshore export cable circuit(s) will be located.
Proposed Project	All aspects of the Llŷr 1 development (i.e. the onshore and offshore components).
Onshore Substation	Located within the Onshore Development Area, converts high voltage generated electricity into low voltage electricity that can be used for the grid and domestic consumption.
Section 36 consent	Consent to construct and operate an offshore generating station, under Section 36 (S.36) of the Electricity Act 1989. This includes deemed planning permission for onshore works.

Contents

List of Figures

List of Tables

8-F INTRODUCTION – GREEN INFRASTRUCTURE STATEMENT

8.1 Introduction

1. As set out in the twelfth edition of Planning Policy Wales (PPW) (Welsh Government, 2024a), a Green Infrastructure Statement is required by Llŷr Floating Wind Limited (hereafter 'the Applicant') to support the consent application for the Llŷr Floating Offshore Wind Project (hereafter referred to as 'the proposed Project'), which includes the onshore cable route with a substation compound at Pembrokeshire, Wales (hereafter referred to as 'the Onshore Development Area'; see **Appendix 8F, Annex A**: **Baseline Conditions**).
2. This Green Infrastructure Statement focuses on green infrastructure within the Onshore Development Area. PPW (Welsh Government, 2024) defines green infrastructure as:

   'the network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect places.'

8.1.1. Objectives

3. The objectives of this Green Infrastructure Statement are to demonstrate how the proposed Project has:

   - Applied the step-wise approach to ecological mitigation;
   - Utilised the DECCA (diversity, extent, condition, connectivity and aspects of ecosystem resilience) framework to support ecosystem resilience with regards to green infrastructure;
   - Explored opportunities for incorporating green infrastructure, paying due regard to the building with nature standards framework (BwNSF; BwNSF, 2022); and,
   - Achieved net benefits for biodiversity (NBB), including through the provision of biodiversity enhancement.

8.2 Proposed Project

4. The proposed Project is a floating offshore wind farm located approximately 54 km from Lundy Island and 35 km from the Pembrokeshire Welsh coastline, in the Celtic Sea and comprises all infrastructure required to generate and transmit electricity from the Proposed Development Array Area to the National Grid Connection point adjacent to Pembroke Power Station, the supporting infrastructure and the required temporary construction areas both offshore and onshore.
5. This Green Infrastructure Statement will focus on the onshore project components, as described in detail in **Chapter 04: Description of the Proposed Project** (AECOM, 2024a), which include:

   - The onshore substation compound: the area within which the onshore substation and associated infrastructure will be located. This is an area of up to 15,000 m^2 (excluding Sustainable Drainage Systems (SuDS)), located 1.5 km from the grid connection location; and
   - The Onshore Export Cable Corridor (ONECC): the area within which the onshore export cable circuits will be located. The onshore export cables are connected to the offshore export cables via transition joint bays (TJBs) at the landfall at Freshwater West, and will be brought ashore by Horizontal Directional Drilling (HDD). The OnECC will run from mean low water springs (MLWS) to the grid connection location at Pembroke Dock Power Station.

6. It is understood the proposed Project will require the temporary loss of habitats within the OnECC, and permanent habitat loss within and around the onshore substation. It is also understood that HDD of the OnECC will occur beneath the designated sites within the western portion of the proposed Project, which contain open dune, dune scrub, and dune grassland habitats to avoid direct impacts to them. For the OnECC, depending on its final route, the proposed Project will potentially require the temporary loss of poor semi-improved grassland, neutral semi-improved grassland, improved grassland, marsh/marshy grassland, arable land, dense/continuous scrub, scattered scrub, a line of broadleaved trees, semi-natural broadleaved woodland, semi-natural mixed woodland, swamp, marginal vegetation introduced shrub, bare ground, hedgerows (with and without trees), ruderal vegetation, fences, and/or hardstanding. The OnECC will run under running watercourses and a dry ditch via HDD. For the onshore substation, the proposed Project will require the partial loss of improved grassland and a hedgerow.
7. The habitat lost along the OnECC will be reinstated following the completion of the proposed Project. To compensate for the permanent loss of habitat within and around the onshore substation, the restoration of some arable land and the following mitigation around the onshore substation is proposed (as shown in **Annex B: Indicative Mitigation Landscape Plan**):
    - SuDS basin with integrated native scrub planting;
    - Proposed species-rich grassland in areas not returned to agriculture; and,
    - Proposed native woodland planting.
8. Earthwork bunds will also be created around part of the onshore substation to enhance screening.
9. It should be noted that the mitigation shown on the indicative mitigation landscape plan is still indicative with exact details, including the extent of new habitats and species to be planted, amongst other details, to be confirmed at a later stage.
10. Following the end of the proposed Project, expected around 30 years after construction, the OnECC and onshore substation will be decommissioned. The OnECC will be left in situ, while the onshore substation and TJB will be demolished.
11. The proposed Project is anticipated to take 18 months (subject to change) to construct. Construction lighting will be utilised. The onshore substation will have lighting during its operation phase, including along access paths and along security fencing. In a worst-case scenario, this lighting will be operated for 24 hours although ideally these will only be used when required.
12. Construction of the proposed Project is anticipated to commence in Q1 2027 and last up to 2 years, completing in Q4 2028. Final commissioning of the proposed Project is anticipated to take place in Q4 2028 and the wind farm will be operational for a period of 30 years.

8.3 Legislation and Policy

8.3.2. Wildlife Legislation

13. The following wildlife legislation has been considered when preparing this statement:
    - Wildlife and Countryside Act (WCA) 1981 (as amended);
    - Countryside and Rights of Way (CRoW) Act 2000;
    - Environment (Wales) Act 2016;

- The Conservation of Habitats and Species Regulations (CHSR) 2017 (as amended);
- Protection of Badgers Act 1992;
- The Hedgerow Regulations 1997; and,
- Environment Act 2021.

14. Details of how this legislation, and the below summarised national and local planning policies, relates specifically to species/species groups that are relevant to the proposed Project are also provided in **Appendix 8F, Annex C: Summary of Legislation and Policy**.

8.3.3. National Planning Policy

15. PPW (Welsh Government, 2024a) sets out the land use planning policies of Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs), Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.
16. The National Plan (Welsh Government, 2021) sets out Wales' national development framework that details the Welsh Government's twenty-year plan for shaping the growth and development of the country.
17. Further information on the relevant parts of the PPW and the National Plan is provided in **Appendix 8F, Annex C: Summary of Legislation and Policy**.

8.3.4. Local Planning Policy

18. Relevant local planning policies and supplementary guidance for Pembrokeshire are detailed in the following documents:
    - Pembrokeshire County Council (PCC) Local Development Plan (PCC, 2013);
    - Local Biodiversity Action Plan for Pembrokeshire (Pembrokeshire Biodiversity Partnership, 2011); and,
    - Pembrokeshire Green Infrastructure Assessment (LUC, 2023).
19. A summary of these relevant local planning policies is provided in **Appendix 8F, Annex C: Summary of Legislation and Policy**. For the precise wording of each specific policy refer to the source document. This planning policy has been considered when assessing potential ecological constraints and opportunities identified by the desk study and field surveys; and, when assessing requirements for design options and ecological mitigation.

8.4 Methodology

20. The assessment undertaken in this Green Infrastructure Statement incorporates guidance from the step-wise approach, the DECCA Framework, Natural Resources Wales's (NRW) guide for resilient ecological networks (Garrett & Ayling, 2021), and the BwNSF (BwNSF, 2022) to inform a qualitative comparison between baseline biodiversity and proposed post-development biodiversity. This comparison will be used to determine the overall impact on green infrastructure from the proposed Project.

21. Through consideration of this guidance, the proposed Project will also contribute to overcoming the key challenges in Pembrokeshire as outlined in the South West Wales Area Statement (NRW, 2024), notably reversing the decline of, and enhancing, biodiversity.

8.4.5. Baseline Information

22. The identification of existing Green Infrastructure assets and networks and understanding of existing biodiversity assets forms an essential step in the net benefit assessment. The baseline conditions for the Onshore Development Area are detailed in the following datasets and reports, and have been considered in this Green Infrastructure Statement:

- Datasets:
  - LANDMAP Landscape Habitats (Welsh Government, 2024b);
  - Urban Tree Canopy Cover (Welsh Government, 2018); and,
  - Habitat Networks (Welsh Government, 2022).
- Environmental Statement Reports:
  - **Appendix 4A: Outline Construction Management Plan (CEMP)** (AECOM, 2024b);
  - **Appendix 8A: Chough Survey Report** (AECOM, 2022a);
  - **Appendix 8B: Preliminary Ecological Appraisal (PEA) Report** (AECOM, 2024c);
  - **Appendix 8C: Bat Survey Report** (AECOM, 2022b);
  - **Appendix 8D: Habitats Regulations Assessment (HRA) Screening** (AECOM, 2024d);
  - **Appendix 8E: HRA – Appropriate Assessment** (AECOM, 2024e);
  - **Chapter 08: Ecology and Biodiversity** (AECOM, 2024f); and,
  - **Chapter 10: Water Environment** (AECOM, 2024g).
- Other reports considered:
  - Erebus Onshore Cable Route Technical Appendix 20.3: National Vegetation Classification Survey Report (ITPEnergised, 2021);
  - Greenlink Environmental Statement – Onshore Wales [Appendix 6.4] – Dormouse Survey Report (Greenlink Interconnector Ltd, 2019a);
  - Greenlink Environmental Statement – Onshore Wales [Appendix 6.5] – Riparian Mammals Survey Report (Greenlink Interconnector Ltd, 2019b);
  - Greenlink Environmental Statement – Onshore Wales [Appendix 6.7] – Bat Survey Report (Greenlink Interconnector Ltd, 2019c); and,
  - Erebus Project – Preliminary Ecological Assessment of potential cable routes and substation locations near Angle and Rhoscrowther, Pembrokeshire (Hudson & Sutton, 2020).

23. The following documents have informed the construction and post construction information available for the proposed Project:

- **Chapter 04: Description of the Proposed Project** (AECOM, 2024a); and,
- **Annex B: Indicative Landscape Mitigation Plan** (AECOM, 2024h).

8.4.6. Step-Wise Approach

24. This statement demonstrates how the proposed Project has applied the step-wise approach to mitigation, as illustrated in **Figure 8F-1** and detailed in Section 6.4.15 of PPW (Welsh Government, 2024). How the proposed Project has followed the Step-Wise Approach is addressed and summarised in **Section 8.7**.

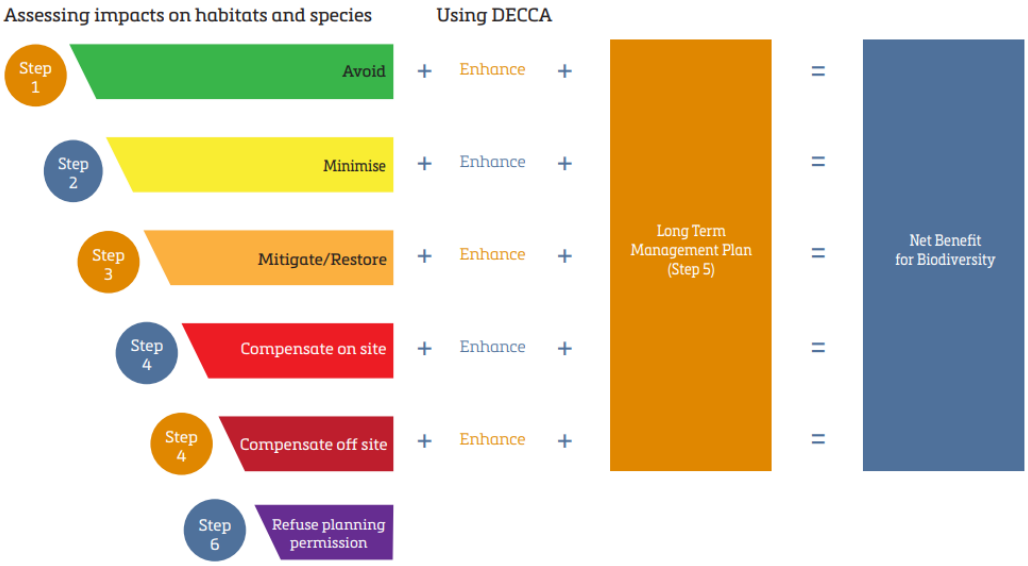

Figure 8F-1 Step-wise Approach to Mitigation (Welsh Government, 2024)

25. The step-wise approach sets out the steps in order of priority to ensure that adverse effects on biodiversity is reduced. The measures undertaken at each step must be incorporated with enhancement measures and the principles of the DECCA Framework (outlined in **Section 8.4.7**) to ensure a net benefit for biodiversity is achieved.

- The first priority is the avoidance of impacts on biodiversity;
- If avoidance is not possible, adverse impacts to biodiversity must be minimised, by reducing the size of proposed Project and maintaining the connectivity of habitats. Impacts must also be minimised for Section 7 habitats and features used by Section 7 species to ensure their populations are maintained. Section 7 habitats and species are those highlighted in the Environment (Wales) Act 2021 as being important for the purpose of maintaining and enhancing biodiversity in relation to Wales;
- If impacts cannot be avoided or sufficiently minimised then adverse effects to biodiversity must be mitigated against, and/or habitats and features for species restored. The mitigation and restoration must target the specific adverse effects of the proposed Project, seek to restore in excess of like-to-like, and account for factors like time lags in recovery of habitats and species populations;
- When these first three steps have been exhausted, compensation within the 'Site' (4a), or off 'Site' (4b) if not otherwise feasible, is required. Compensation must always be a

last resort and must be of significant magnitude to fully compensate for any loss, be place based, and take account of the Section 6 Duty, the DECCA framework and appropriate ecological advice from the local authority Ecologist, NRW or a suitably qualified ecologist;

- A Long-Term Management Plan will be produced setting out the management of the 'Site' and future monitoring arrangements for all secured measures. The management plan must identify the funding mechanisms in place to meet the management plan objectives and the achievement of net benefits for biodiversity; and
- Failure to action any of these steps will result in a planning application being refused.

8.4.7. DECCA Framework

26. This Green Infrastructure Statement demonstrates how the proposed Project supports ecosystem resilience by evaluating its components against the DECCA framework. This is addressed and summarised in **Section 8.7.** . Ecosystem resilience is defined by NRW (Garrett & Ayling, 2021) as:

'The capacity of ecosystems to deal with disturbances, either by resisting them, recovering from them, or adapting to them, whilst retaining their ability to deliver services and benefits now and in the future' (Disturbances are interpreted to mean pressures and demands on the ecosystem).'

27. Efforts to maintain and strengthen the following attributes within the DECCA Framework has been considered to support ecosystem resilience in association with the proposed Project:

- **Diversity** at all scales including genetic, species, habitat and ecosystems or landscape scale;
- **Extent** of ecosystems and habitats;
- **Condition** of ecosystems and biodiversity, including their structure and functioning; and,
- **Connectivity** between and within ecosystems and habitats.

8.4.8. Building with Nature Standards Framework

28. Opportunities for incorporating green infrastructure have been undertaken paying due regard to the BwNSF (BwNSF, 2022). The BwNSF sets out twelve best practice standards to define a benchmark of good green infrastructure and how to deliver it. For full details on each standard refer to the original text (BwNSF, 2022).

29. The proposed Project has been evaluated against each of the twelve standards which is addressed in **Section 8.8**.

8.4.9. Pembrokeshire Green Infrastructure Assessment

30. The assessment of priorities and opportunities for incorporating green infrastructure has been undertaken paying due regard to Pembrokeshire Green Infrastructure Assessment (LUC, 2023a). The vision of the Green Infrastructure Assessment is supported by a series of six aims, as outlined below:

- Aim 1 – Create a setting for urban and rural prosperity;
- Aim 2 – Enhance the visitor experience and economy;
- Aim 3 – Build healthier communities;
- Aim 4 – Maintain and enhance quality of place;
- Aim 5 – Ensure urban and rural areas are resilient to climate change; and,
- Aim 6 – Protect and enhance biodiversity & natural networks.

31. Pembrokeshire Green Infrastructure Assessment includes Urban Tree Planting and Pollinator Strategies (LUC, 2023b). Though this proposed Project is not within an urban area, the principles of strategy have been paid due regard.
32. The proposed Project has been evaluated against the six aims of the Green Infrastructure Assessment which is addressed in **Section 8.9**.

8.5 Baseline Information

33. The identification of existing Green Infrastructure assets and networks and identification of existing biodiversity assets forms an essential step in the net benefit assessment. This Section outlines the green infrastructure and biodiversity assets present (or likely present in the case of some species) within the Onshore Development Area.
34. The baseline conditions of the Onshore Development Area are summarised below from the baseline reports listed in **Section 8.4.5** and the biodiversity features are illustrated in **Appendix 8F, Annex A: Baseline Conditions**.
35. Full details are given in Appendix 8B: PEA Report and Chapter 08: Ecology and Biodiversity unless otherwise referenced.

8.5.1. Designated Sites

36. For full details of designated sites within 2 km of the Onshore Development area, and within 10 km of designated sites for bats, please refer to **Table 8-9** in **Chapter 08: Ecology and Biodiversity**. For the distribution of these designated sites, please refer to **Figures 8B-2** to **8B-4 Appendix 8B: PEA Report.**
37. In summary, designated sites, inclusive of their features, that may be impacted by the Onshore Development Area are:

- Castlemartin Coast Special Protection Area (SPA);
- Limestone Coast of South West Wales Special Area of Conservation (SAC);
- Broomhill Burrows Site of Special Scientific Interest (SSSI);
- Pembrokeshire Marine SAC;
- West Wales Marine SAC; and,
- Gweunydd Somerton Meadows SSSI.

8.5.2. Habitats

38. For full details of the habitats within the Onshore Development Area, please refer to **Table 8-10** in **Chapter 08: Ecology and Biodiversity** (AECOM, 2024f). For the distribution of these habitats see **Appendix 8F, Annex A: Baseline Conditions**.
39. Of particular note, as highlighted in **Appendix 8B: Preliminary Ecological Appraisal (PEA) Report** (AECOM, 2024c), are the following Section 7 Habitats of Principal Importance which are within the Onshore Development Area:

- Lowland Mixed Deciduous Woodland (broadleaved woodland – semi-natural)
- Coastal Sand Dunes (dune grassland, dune scrub and open sand dune);
- Hedgerows (species-rich hedge with trees-native, species-poor intact hedge, and native, species-rich intact hedge); and,
- Standing water habitats.

40. These habitats are considered of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales under the Environment (Wales) Act 2016. The species that these habitats may support are described in **Appendix 8B: Preliminary Ecological Appraisal (PEA) Report** (AECOM, 2024c).

8.5.3. Species

41. For full details of the species present, or potentially present, within the Onshore Development Area, please refer to **Table 8-11** in **Chapter 08: Ecology and Biodiversity** (AECOM, 2024f).

42. In summary, species present, or potentially present based on habitat suitability, include:

- Protected and notable plants, including three species on the Local Biodiversity Action Plan (LBAP): squinancy-wort (*Asperula cynanchica subsp. occidentalis*), dune fescue (*Vulpia fasciculata*), and corn marigold (*Glebionis segetum*); and one protected under the CHSR and WCA: early gentian (*Gentianella anglica*) which is a feature of the Limestone Coast of South West Wales SAC;
- Protected and notable fungi and bryophytes including the LBAP sand-hill screw-moss (*Syntrichia ruralis var. ruraliformis*), and petalwort (*Petalophyllum ralfsi*), which is a qualifying feature of the Limestone Coast of South West Wales SAC;
- Protected and notable terrestrial invertebrates, including the Schedule 5 of the WCA white-letter hairstreak (*Satyrium w-album*);
- Common toad (*Bufo bufo*), a species of principal importance and a LBAP species;
- All four common reptile species (common lizard (*Zootoca vivipara*), slow-worm (*Anguis fragilis*), adder (*Vipera berus*), and grass snake (*Natrix helvetica*)), which are on Schedule 5 of the WCA, and are species of principal importance and LBAP species;
- Breeding birds, including ones on Schedule 1 of the WCA, the Conservation Concern 5 (BoCC5) Red list and the Amber list (British Trust for Ornithology. 2021) and are species of principal importance and LBAP species. Chough (*Pyrrhocorax pyrrhocorax*) are a feature of the Castlemartin Coast SPA and Angle Peninsula SSSI, and were recorded to the west of the Onshore Development Area (**Appendix 8A: Chough Survey Report** (AECOM, 2022a));
- Hazel dormouse (*Muscardinus avellanarius*), which are protected under the CHSR and WCA, and are species of principal importance and a LBAP species;
- Badger (*Meles meles*) which are protected under the Protection of Badgers Act 1992;
- Bat species including lesser horseshoe bat (*Rhinolophus hipposideros*), greater horseshoe bat (*Rhinolophus ferrumequinum*), common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*), Myotis species (*Myotis sp.*), noctule (*Nyctalus noctule*), barbastelle (*Barbastella barbastellus*), Leisler's bat (*Nyctalus leisleri*), Nathusius' pipistrelle (*Pipistrellus nathusii*), serotine (*Eptesicus serotinus*) and long-eared bats (*Plecotus sp.*) (**Appendix 8C: Bat Survey Report** (AECOM, 2022b); Greenlink Interconnector Ltd, 2019c). A lesser horseshoe bat roost was also recorded in the war memorial located on the B4319, north of Freshwater West Beach (Greenlink Interconnector Ltd, 2019c). All bats are protected by the CHSR and WCA. Common pipistrelle, soprano pipistrelle, brown long-eared bat (*Plecotus auritus*), noctule, greater horseshoe bat and lesser horseshoe bat are species of principal importance.
- Otter (*Lutra lutra*), which are protected under the CHSR and the WCA, and are species of principal importance, and a LBAP species;
- Polecat (*Mustela putorius*), which are a species of principal importance;

- Weasel (*Mustela nivalis*), which are a LBAP species;
- Hedgehog (*Erinaceus europaeus*), which are a species of principal importance; and,
- Invasive Non-Native Plant Species (INNPS) listed on Schedule 9 of the WCA which include montbretia (*Crocosmia x crocosmiiflora*); Japanese rose (*Rosa rugosa*); and Nuttall's waterweed (*Elodea nuttallii*).

8.5.4. Public Access

43. There are six sections of Public Rights of Way (PRoW) that enter the OnECC, but not in the area of the onshore substation (AECOM, 2024j). This includes part of the National Wales Coast Path which crosses the western part of the Onshore Development Area.

8.5.5. Water

44. Three ponds were recorded within the Onshore Development Area (**Appendix 8B: PEA Report** (AECOM, 2024c)):
    - The first is to the west of the Onshore Development Area within improved grassland;
    - The second is to the west of the Onshore Development Area within arable land; and
    - The third is near the centre of the Onshore Development Area within arable land.
45. There is likely a fourth pond based on aerial imagery in the centre of the Onshore Development Area within a wet depression, but it is in an area that could not be accessed due to dense vegetation so could not be ground truthed.
46. At least six streams run through the Onshore Development Area. Marsh/marshy grassland is present in the centre of the Onshore Development Area, and swamp is on the margin of the third pond.
47. Eleven ordinary watercourses, including two tributaries of Goldborough Pill West, could be crossed by the OnECC. Furthermore, 15 ponds are hydrologically connected to the Onshore Development Area (**Chapter 10: Water Environment** (AECOM, 2024g)).

8.6 Construction and Post-construction Information

48. The construction and post construction proposals for the Onshore Development Area are summarised below and the biodiversity features are annotated in **Annex B: Indicative Mitigation Landscape Plan** (AECOM, 2024h).

8.6.6. Designated Sites

49. The proposed Project will utilise HDD to avoid impacts to the Castlemartin Coast SPA, Limestone Coast of South West Wales SAC, and Broomhill Burrows SSSI which lie within the Onshore Development Area. The remaining designated sites will not be impacted, directly or indirectly, due to their distance from the proposed Project and/or the utilisation of mitigation measures, in particular pollution control measures.

8.6.7. Habitats

50. The proposed Project will result in the temporary loss of habitats within the OnECC. The extent and type of habitat to be temporarily lost will be dependent on the final route, but will likely include at least poor semi-improved grassland, neutral semi-improved grassland, improved grassland, arable land, and hedgerows. The habitat lost along the OnECC will be reinstated following the construction of the proposed Project. Some of this habitat may be improved, such as increasing species-richness of the hedgerows though this is not yet confirmed.

51. The proposed Project will require the permanent loss of habitats within the area of the onshore substation. The habitats lost include part of the improved grassland and an intact species-rich hedgerow. To mitigate for the permanent loss of habitat for the onshore substation, the following mitigation around the onshore substation is proposed as shown in **Annex B: Indicative Mitigation Landscape Plan** (AECOM, 2024h):

52. A SuDS basin, with integrated native scrub planting;

- Proposed species-rich grassland in areas not returned to agriculture; and,
- Proposed native woodland planting.

8.6.8. Species

53. Post-construction, the proposed Project will provide opportunities for species within the Onshore Development Area through improving some of the habitat to be reinstated and potentially creating and enhancing habitats as described in **Section 8.6.7**

8.6.9. Public Access

54. The proposed Project will not increase the extent of public access or PRoW through the Onshore Development Area.

8.6.10. Water

55. Water features currently within the Onshore Development Area (see **Section 8.5.5**) will be protected and maintained during construction and will not be affected post development.

56. A SuDS basin is proposed at the onshore substation.

8.7 Potential Ecological Impacts and Mitigation

57. This section sets out the main:

    - Priorities towards green infrastructure (NRW, 2023);
    - Threats and challenges to the existing green infrastructure by providing a summary of potential ecological impacts and proposed mitigation; and,
    - Opportunities to improve the green infrastructure beyond the mitigation to maintain the existing green infrastructure.

58. Furthermore, this section:

    - Demonstrates the application of the step-wise approach (**Table 8F-1**) through summarising the potential impacts to green infrastructure and how these will be mitigated against; and,
    - Evaluates the attributes of the DECCA framework which will be impacted by the proposed Project.

8.7.11. Priorities

59. Priorities are defined as the main socio-economic and environmental challenges that need to be addressed in the area of the proposed Project (NRW, 2023). These challenges can be addressed through green infrastructure and, for this proposed Project, have been identified as:

    - Landscape and amenity, for example increasing green infrastructure and maintaining/improving a place's local character;
    - Biodiversity and ecological resilience to cope with changes such as human disturbance and climate change; and,
    - Managing environmental risks, to protect biodiversity and natural networks, including:
    - Pollution Control – maintain water and air quality, and avoid/minimise light spill; and,
    - Flooding – control of surface runoff.

60. These challenges are addressed through mitigation measures as summarised in **Table 8F-1**.

8.7.12. Threats and Challenges

61. **Chapter 08: Ecology and Biodiversity** (AECOM, 2024f) contains a detailed assessment of potential impacts (threats and challenges to green infrastructure) and embedded and additional mitigation. This chapter will be the primary source of information regarding ecological impact assessment for the proposed Project. The impacts (threats and challenges) to green infrastructure and proposed mitigation are summarised in **Table 8F-1**.

62. Potential impacts during construction phase relevant to green infrastructure comprise habitat loss; habitat severance or fragmentation; habitat degradation; and species disturbance. Potential impacts during the operational phase comprise habitat degradation; and species disturbance.

8.7.13. Opportunities

63. Within and in addition to the mitigation which seeks to protect and maintain the green infrastructure within the Onshore Development Area, the following opportunities at a proposed Project scale to improve green infrastructure have been identified:

- Improve existing habitats to increase their species diversity and ecological resilience; for example, planting new locally native species within areas of removed hedgerow and establishing species-rich grassland in place of improved grassland;
- Establishment of new habitats which are rare within the Onshore Development Area; for example, water bodies (SuDS), and native woodland planting; and,
- Better integration of water into the local environment through SuDS.

64. No opportunities for improving access to public open space through green infrastructure have been identified.

8.7.14. Step-Wise Approach

65. The step-wise approach to mitigation has been applied throughout the design of the proposed Project through consultation with ecological consultants, and landscape architects). For full details of the potential impact assessment, and mechanisms for avoidance, minimisation, embedded and additional mitigation, compensation and long-term management, please see **Chapter 08: Ecology and Biodiversity** (AECOM, 2024b).
66. The application of the step-wise approach in the proposed Project is summarised below with more detail provided in **Table 8F-1**:

8.7.15. Step 1 Avoid – Impacts to the following ecological features have been avoided:

- Designated sites; and,
- Retained habitats, as well as the species that depend on them.

67. Measures outlined in **Appendix 4A: Outline Construction Environmental Management Plan** (AECOM, 2024b) including pollution control, will avoid impacts from the proposed Development to retained habitats. The loss of connectivity during the temporary removal of habitats, especially hedgerows, will be minimised by filling the gaps between periods of work with cut stems and branches during the active period for bats (April to October, inclusive). Impacts from light pollution on wildlife connectivity and bat roosts will be avoided during construction through lighting control, also outlined in **Appendix 4A: Outline Construction Environmental Management Plan** (AECOM, 2024b). Impacts from the spread of INNPS during construction will be avoided through the INNPS management plan (AECOM, 2024k).

Step 2 Minimise:

- Impacts to ecological receptors that could not be avoided have been minimised by only the minimum amount of habitat required for the proposed Project will be removed. Impacts from the permanent lighting around the onshore substation will be minimised by the use of native woodland planting and earthwork bunds to screen the adjacent habitats from light spill.

Step 3 Mitigate:

- To mitigate for loss of habitats, habitats will be reinstated, improved, and created.

Step 4 Compensate on 'Site':

- Where trees have been felled and cannot be replanted within 3 m of the OnECC, scrub and shrub will be planted in their place. Trees will also be planted at a ratio of at least three planted to one felled immediately adjacent to this buffer.

Step 5 Long Term Management Plan:

- The production and following of a Landscape Environmental Management Plan (LEMP), alongside monitoring of the mitigation measures during and after the construction of the proposed Project, will ensure the existing and new green infrastructure on the Onshore Development Area is maintained.

8.7.16. DECCA Framework

68. A summary of how the proposed Project has incorporated the DECCA framework to support ecosystem resilience is provided below, and provided in more detail in **Table 8F-1**.

- **Diversity** – The diversity of green infrastructure will be increased by potentially improving the species-richness of reinstated habitats, and the creation of a SuDS basin with integrated locally native scrub, species-rich grassland and native woodland planting on Onshore Development Area, which are either new habitat types or habitat types infrequent across the Onshore Development Area.
- **Extent** - The extent of green infrastructure (habitats) will be slightly decreased by the proposed Project due to the construction of the onshore substation, but the loss will be mitigated by only removing the minimum area required for the proposed Project and the creation of more biodiverse habitats following completion of construction.
- **Condition** - The condition of habitats will be maintained by measures outlined in **Appendix 4A: Outline Construction Environmental Management Plan** (AECOM, 2024b) and a LEMP, which will include monitoring.
- **Connectivity** - The connections between habitats will be maintained through reinstatement in the long term, and by cut stems and branches bridging the gaps in the short term in the case of hedgerows during the active period for bats (April to October, inclusive). The planting of new native woodland will compensate for permanent loss the hedgerow at the onshore substation to maintain part of the original connectivity.

Table 8F-1 Summary of Ecological Impacts on Existing Green Infrastructure and Mitigation

Ecological Feature	Summary of Potential Impact without Mitigation	Summary of Mitigation
Designated Sites	Castlemartin Coast SPA, Limestone Coast of South West Wales SAC, and Broomhill Burrows SSSI lie within the southwest of the Onshore Development Area, and the Pembrokeshire Marine SAC is directly adjacent to the Onshore Development Area boundary. As the proposed Project will involve drilling the cable underneath these designated sites, direct impacts will be avoided. However, the designated sites may be indirectly impacted by impacts including run-off and disturbance from noise, movement/visual and light pollution. The following Annex I terrestrial habitats, which are designated within the Limestone Coast of South West Wales SAC, may be indirectly impacted (AECOM, 2024d, 2024e): • Fixed Coastal Dunes with Herbaceous Vegetation ('Grey Dunes); • European dry heaths; and, • Semi-Natural Dry Grasslands and Scrubland Facies on Calcareous Substrates (Festuco-Brometalia) • The Annex II plant species petalwort which is designated within the Limestone Coast of South West Wales SAC may be indirectly impacted (AECOM, 2024d, 2024e). • Impacts to early gentian within the Limestone Coast of South West Wales SAC, and shore dock within the Pembrokeshire Marine SAC, have been scoped out of being impacted as their distribution does not overlap with the proposed Project (AECOM, 2024d, 2024e). • The Annex II mammal species - otter, greater horseshoe bat, and lesser horseshoe bat - which are designated within the Pembrokeshire Bat Sites and Bosherston Lakes SAC, Limestone Coast of South West Wales SAC, or Pembrokeshire Marine SAC, may be directly impacted where they overlap with the proposed Project and indirectly impacted if they within 10 km of the proposed Project (AECOM, 2024d, 2024e).	The proposed Project will follow precautionary working and mitigation methods outlined in **Appendix 4A: Outline Construction Environmental Management Plan** (CEMP) (AECOM, 2024b) and associated biodiversity management plan (not presently available) which will be prepared and implemented during construction to prevent adverse impacts to designated sites. These mitigation measures will include following best practice guidance outlined in the Environment good practice handbook (Laws & D'aleo, 2016) and Guidance for Pollution Prevention (GPP) (NetRegs, undated); storage of works materials, equipment, and plant outside of the designated sites on existing hardstanding or areas of bare ground where there are no important floral communities; avoidance and minimising of tracking by machinery and trampling by personnel; control of lighting; installation of acoustic fencing to protect breeding chough (**Appendix 8A: Chough Report** (AECOM, 2022a)), and biosecurity measures to prevent the spread of INNPS onto designated sites. Habitats designated within the designated sites, and the habitats suitable for designated species, must be avoided and left undisturbed wherever possible by the implementation of an appropriate buffer during the works (AECOM, 2024d, 2024e). This has been achieved in the west of the Onshore Development Area by directional drilling under the designated sites. Reinstatement of any habitat lost which may impact features of designated sites, including commuting and foraging bats, will ensure that most of the habitat loss is temporary and likely enhance the habitats present, for example through improving hedgerows. This will minimise the long-term impact to species which are features of designated sites. With this mitigation, the AA determined there will be no impact to the features of SACs and SPAs (**Appendix 8E: HRA RIAA** (AECOM, 2022a)). The effectiveness of mitigation measures will be monitored as per the requirements of **Appendix 4A: Outline Construction Environmental Management Plan** (AECOM, 2024b)**.**

Ecological Feature	Summary of Potential Impact without Mitigation	Summary of Mitigation
	Chough, an Annex II bird species, a feature within the Castlemartin Coast SPA may be indirectly impacted due to proximity of their breeding grounds to the proposed Project. • These habitats and species may be impacted through a combination of the following pathways (AECOM, 2024d, 2024e): • Physical change of habitat; • Physical disturbance; • Physical loss of habitat; • Loss of functionality linked land; • Visual and noise disturbance; • Disturbance/displacement; • Pollution / contamination; and, • Introduction and spread of INNPS. The Onshore Development Area lies within the Core Sustenance Zone (CSZ) (Bat Conservation Trust, 2020) for bats cited within the Castlemartin Coast SAC, Limestone Coast of South West Wales SAC, the Milford Haven Waterways SSSI, the Castlemartin Range SSSI, and within the Orielton Stable Block and Cellars SSSI. While the connectivity of most habitats within the Onshore Development Area will not be severed permanently, and not to an extent that will impact bats as a feature of the designated sites, bats may be indirectly impacted by noise and lighting. Gweunydd Somerton Meadows SSSI is hydrologically connected to the Onshore Development Area and may be indirectly impacted by pollution should it enter a watercourse.	
Habitats	The proposed Project will involve loss of habitat in the short term and the long term. Temporary and partial loss of habitats will occur to facilitate the construction of the OnECC. Habitats to be temporarily and partially lost will likely include most types of habitat within the Onshore	Habitats will be retained as much as possible, and only the minimum extent required for the proposed Project will be removed. Habitats of principal importance will be prioritised as habitats not to be removed and

	Development Area to various extents, especially grassland habitats. The extent of a particular habitat's loss will depend on the final route of the OnECC. Directional drilling of the OnECC will occur under the western portion of the Onshore Development Area to avoid direct impacts from the OnECC to open dune, dune scrub, and dune grassland habitats. Permanent habitat loss will occur to facilitate the onshore substation to reduce the extent of improved grassland and intact species-rich hedgerow. The permanent severing of the intact species-rich hedgerow is expected to be 10 m or less and will occur at one location only to minimise the loss of connectivity. The proposed Project has the potential to directly and indirectly impact habitats of principal importance (hedgerows, and potentially lowland mixed deciduous woodland depending on the final route and width of the OnECC) as well as watercourses throughout the Onshore Development Area. At the decommissioning phase, no impacts to habitats are anticipated along the OnECC as the cable will likely be left in-situ. However, as NRW have expressed a preference for the buried cable to be removed on decommissioning, there will be an environmental and economic assessment in the years leading up to decommissioning, and a review of industry best practice at the time to determine the most appropriate approach for the proposed Project. Therefore, impacts to habitats along the OnECC cannot be definitely ruled out. Any impacts would likely be to the habitats during the demolition of the onshore substation and TJB, and would include degradation from dust, noise, and pollution for example.	will be avoided where possible. Where necessary, hedgerow removal will be limited to a maximum of 10 m at each hedgerow crossing. The design process will actively minimise the number of watercourse crossings required, by avoiding works within watercourses as far as possible, using buffer strips around sections of workings adjacent to watercourse crossings, and implementing bund and embankment features. This will minimise impacts on watercourses, including their hydrological and habitat linkages. Habitats removed to facilitate the construction of the OnECC will be reinstated following the end of the construction of the proposed Project. Although the specifics are not confirmed, some habitats may be improved by, for example, increasing species-richness. All sections of removed hedgerows will be reinstated either with semi-mature planting or translocated stools from the removed sections of hedgerow (AECOM, 2024b). Trees cannot be planted within 3 m of the OnECC, so scrub and shrub will be planted as alternatives within this 3 m buffer if trees are removed. However, it is expected that existing trees will be retained and appropriate root protection areas implemented where possible. If trees are felled, mitigation must involve replacement planting at a ratio equivalent to the quality, environmental and ecological importance of the tree(s) lost and this must be preferably within the Onshore Development Area, or immediately adjacent to the Onshore Development Area, and at a minimum ratio of at least three trees of a similar type and compensatory size planted for every one lost (Welsh Government, 2024). Permanent loss of habitat at the onshore substation will be mitigated by the restoration of some areas back to arable land and compensated by the establishment of new habitats including a new SuDS basin with integrated native scrub planting, proposed species-rich grassland, and, proposed native woodland planting. The extent and species composition of these new habitats is unknown, except that the species will be locally native. The planting of native scrub, species-rich grassland, and native woodland planting will likely increase the diversity, condition, and resilience of habitats at this location given, at present, there is only improved grassland and an intact species-rich hedgerow. The SuDS basin will form a wetland habitat within the Onshore Development Area. No wetland habitats are

Ecological Feature	Summary of Potential Impact without Mitigation	Summary of Mitigation
		present in the area of the onshore substation pre-construction, so this new habitat type will help increase habitat diversity. It will also provide resilience allowing the Onshore Development Area to control and retain surface water flow, assisting with climate adaptability, flood risk and water quality. The works will follow precautionary working and mitigation methods outlined in **Appendix 4A: Outline Construction Environmental Management Plan** (AECOM, 2024b) which will be prepared and implemented during construction to prevent adverse impacts to habitats. These mitigation measures must follow best practice PPGs/GPPS (D'aleo & Law, 2016) and the CIRIA C715 Environmental Good Practice On Site handbook (NetRegs, undated) to prevent environmental run-off and degradation of the surrounding habitats; avoid trampling by personnel and tracking by machinery of retained habitats; and the storage of works materials, equipment and plant on existing hardstanding or areas of bare ground where there are no important floral communities, amongst other measures. Furthermore, chemicals will be stored away from habitats known to used by protected species, and at least 10 m from watercourses (AECOM, 2024b). The effectiveness of mitigation measures will be monitored as per **Appendix 4A: Outline Construction Environmental Management Plan** (AECOM, 2024b).
	The proposed Project may result in the degradation of retained habitats through indirect impacts associated with construction related activities including the potential for pollution from run-off and dust, lighting and increased trampling and tracking from personnel and machinery/vehicles.	During construction, industry standard mitigation measures will be implemented through **Appendix 4A: Outline Construction Environmental Management Plan** (AECOM, 2024b) to protect retained habitats from construction-related activities, including pollution events and trampling and tracking of sensitive habitats. These mitigation measures will include following best practice guidance outlined in the Environment good practice handbook (Law and D'aleo, 2016) and GPP (NetRegs, undated), and exclusion areas around retained habitat; for example, the root protection area of retained trees will be fenced off to prevent damage, including root compaction and knocking off or damaging over hanging

Ecological Feature	Summary of Potential Impact without Mitigation	Summary of Mitigation
		limbs. These measures will avoid habitat degradation impacts from construction related activities. Protection against pollution via measures in **Appendix 4A: Outline Construction Environmental Management Plan** (AECOM, 2024b) will maintain the condition of habitats on and adjacent to the Onshore Development Area. The effectiveness of mitigation measures will be monitored as per **Appendix 4A: Outline Construction Environmental Management Plan** (AECOM, 2024b).
Species	Activities during construction and operation have potential to impact species through disturbance, for example, through increases in lighting, noise, and human activity. Species disturbance can be mitigated by consideration of green infrastructure so is included within this statement. Impacts such as potential for injury to species are not discussed here. In summary, species may be disturbed by: • the increased human activity, noise, and vibration disturbance from the construction phase may displace mobile species; • temporary and permanent loss of a range of habitats across the Onshore Development Area will reduce the extent of suitable habitat for species, and may cause mobile species to be displaced; • permanent loss and fragmentation of the hedgerow at the onshore substation has the potential to have a minor impact on local landscape connectivity to contravene Standard 1 of BwNSF; • temporary works lighting during the construction phase and permanent lighting during the operational phase, where required for security and access, has potential to degrade the adjacent retained habitats through light spill. This may disturb commuting and foraging nocturnal wildlife including bats, otter, badger, and hedgehog, and potentially diurnal species, including breeding birds;	Mitigation measures in **Appendix 4A: Outline Construction Environmental Management Plan** (AECOM, 2024b) must be followed to minimise impacts from noise, lighting, and pollution, for example, to avoid degrading retained habitat suitable for species and disturbing species. The extent of habitat removed, even if it is to be reinstated, will be minimised and retained habitat will be protected as described in Habitats above. Where habitat is to be removed, the priority will be to remove habitat that can be re-established in a shorter time frame such as grassland, rather than habitat, like woodland, for example. which takes more time to reestablish. This will minimise the time that the habitat available for species is reduced. If construction works resulting in the severing of hedgerows occurs during the summer months, it will be necessary to provide linear connection of hedges overnight to maintain bat flight lines (AECOM, 2024b). This will be installed at the height of the hedge canopy so that bats flying along the hedgerow do not need to deviate in either the horizontal or vertical plane. This can be achieved through mounting cut stems or branches from the cleared hedgerow on barrels which can the moved on to the alignment of the hedgerow at the end of the working day. No construction works are to be undertaken during the hours of darkness wherever possible. Where this cannot be avoided, task lighting will be the minimum intensity required for safety purposes and the extent of the lit area will be limited to avoid light spill onto adjacent habitats. Where lighting is required, it must not be directed on any potential bat roosts. Further bat roost emergence surveys

Ecological Feature	Summary of Potential Impact without Mitigation	Summary of Mitigation
	• lighting, noise and vibration disturbance from the construction phase, and new lighting from the operation phase may indirectly impact any potential roosts in the five trees and six buildings with PRFs, and other trees and woodland blocks, which have not been surveyed for bats, as well as confirmed roosts in the war memorial (Greenlink Interconnector Ltd, 2019c). This is especially likely for the tree and building on and close to the boundary of the location for the onshore substation; and, • during the operational phase, occasional maintenance and repair works will be required on the onshore substation or the onshore cable. This may require vehicle access, human presence, vegetation management, and temporary loss of habitat and linear features. However, this would be anticipated to be very small scale, highly localised and of a short-term duration. At the decommissioning phase, no impacts to species are anticipated along the OnECC as the cable will likely be left in-situ. Any impacts would likely be to the protected species that may have established within the enhanced habitats surrounding the onshore substation during its demolition. Impacts include disturbance from noise and vibration.	and/or endoscopic inspections are required on trees and buildings if they will be unavoidably impacted by lighting and/or other indirect impacts by the proposed Project. The native woodland planting and earthwork bunds around the substation will help screen the adjacent retained habitats from permanent lighting. Enhancement and creation of habitats around the onshore substation will compensate for the habitat lost and provide a greater diversity of habitats for species, for example the SuDS basin and species-rich grassland. The effectiveness of mitigation measures will be monitored as per **Appendix 4A: Outline Construction Environmental Management Plan** (AECOM, 2024b).
INNPS	There is potential to spread INNPS within the Onshore Development Area and off- Onshore Development Area during construction which could reduce the diversity and condition of green infrastructure. INNPS within the Onshore Development Area comprise montbretia, Japanese rose, and Nuttall's waterweed.	A INNPS management plan (AECOM, 2024kf) has been developed which will detail the measures to control the spread of any INNPS present at the Onshore Development Area during vegetation clearance and construction, including the recommendation to remove the INNPS prior to construction. It will include appropriate control measures for INNPS present within the Onshore Development Area, biosecurity measures (such as controlled access and defined access routes) during any works, details on the removal and disposal of the plants and any contaminated soil and a toolbox talk and details surrounding the technical oversight by an ECoW. Measures in the biosecurity plan and biodiversity management plan will avoid impacts from spreading INNPS, and improve the diversity and condition of the habitats the INNPS are in.

8.8 Building with Nature Standards Framework

70. BwNSF sets out best practice standards to define a benchmark of good green infrastructure and how to deliver it. How the proposed Project has paid due regard to the BwNSF (BwNSF, 2022), with respect to each of its twelve standards, is summarised in **Table 8F-2.**

Table 8F-2 Summary of Proposed Green Infrastructure Mitigation and Enhancement and its Link to BwNSF

Standard	Mitigation included within the Proposed Project that aligns with the Standard	Justification for meeting the standard
1 Optimises Multifunctionality and Connectivity	Creation of habitats	A SuDS basin with integrated native scrub planning, species-rich grassland, and native woodland planting will be created around the onshore substation. The SuDS will provide a multifunctional benefit by slowing and retaining surface water flows. The native woodland planting will provide a multifunctional benefit by provide screening between the onshore substation and wider landscape. New planting will provide aesthetic value in a predominantly agricultural landscape.
	Maintaining connectivity	Habitats will be reinstated following the completion of the proposed Project. During the construction phase, during the active period for bats (April to October, inclusive) gaps resulting from the temporary removal of hedgerows will be bridged by cut stems and branches on barrels to ensure connectivity is maintained for commuting bats and dormouse (where present). Native woodland planting will compensate in part for the loss of the hedgerow near the onshore substation by being a distinct linear feature close to where the hedgerow will be lost.
	Sensitive lighting	If temporary works lighting is required, light spill and intensity will be the minimum needed to facilitate health and safety and will be focused on the working area only. Permanent lighting is required at the onshore substation during the operation phase. The native woodland planting and earthwork bunds around the substation will help screen the adjacent retained habitats from permanent lighting. Furthermore, the lighting levels will be kept as low as possible within safety and security restrictions. These measures will minimise any disruption in connectivity to dark corridors along green infrastructure required for nocturnal wildlife such as bats.
2 Positively responds to the Climate Emergency	Creation of habitats	The proposed habitats created and potentially enhanced will be more species diverse than the existing habitat being lost, particularly around the onshore substation which is currently

Standard	Mitigation included within the Proposed Project that aligns with the Standard	Justification for meeting the standard
		dominated by improved grassland. The species planted will be locally native. More species-rich native habitats are generally more climate resilient. Once planted, the growing trees and scrub will act as a carbon sink. The SuDS will slow and retain surface water flows to help reduce impact from changes in precipitation due to climate change.
3 Maximises Environmental Net Gains	Creation and improvement of habitats	New and improved habitats will contribute to environmental net gains.
	Pollution control	Pollution control, controlled via **Appendix 4A: Outline Construction Environmental Management Plan** (AECOM, 2024b), will actively mitigate against harmful environmental impacts of the proposed Project on soil water, and air quality that may impact green infrastructure.
	Control INNPS	Controlling and avoiding the spread of INNPS during construction will be managed through the INNPS management plan (AECOM, 2024kf). This will prevent INNPS spreading and further degrading native habitats allowing for native species to regrow in areas that have been dominated by INNPS. Any future incidence of INNPS noted at the onshore substation during operation will be controlled during habitat management through the LEMP.
4 Champions a Context Driven Approach	Creation and improvement of habitats	Local stakeholder engagement has been completed as part of the Environmental Impact Assessment process; This is outlined in **Chapter 08: Ecology and Biodiversity** (AECOM, 2024f). The proposed increased diversity of the replacement habitats with locally native species positively responds to the local agricultural landscape where habitat diversity is generally low. Links to Local guidance on green infrastructure is discussed in Section 7. Local planning policy GN37 Protection and Enhancement of Biodiversity has been considered during project design and the approaches to avoiding and mitigating for impacts on biodiversity are outlined in **Chapter 08: Ecology and Biodiversity** (AECOM, 2024f).
5 Creates Distinctive Places	Maintaining connectivity	Reinstatement of habitats and creation of native woodland, as for Standard 1, will maintain connectivity.
	Creation of habitats to protect or enhance valuable views	Native woodland planting and earthwork bund areas proposed to provide visual screening of the onshore substation that protects the rural character of the landscape.
	Creation of SuDS	New SuDS basin will create a more dynamic landscape with water management.

Standard	Mitigation included within the Proposed Project that aligns with the Standard	Justification for meeting the standard
6 Secures Effective Place-keeping	Onshore substation location and design	The substation location has been chosen so that it is in proximity to existing road infrastructure to reduce the length of any access tracks required and provide easy access for future management and maintenance of the substation and habitat around the substation. The SuDS will help control surface water runoff to provide passive water management.
	Landscape Environmental Management Plan	The long-term management and maintenance of the green infrastructure features will be secured through a LEMP. This will ensure that the habitats are managed to promote the long-term success of the habitat and value to biodiversity. Funding for habitat management will be secured by Floventis Energy Limited for the operational lifetime of the project to manage and maintain the green infrastructure features at the onshore substation. Floventis Energy Limited will instruct a competent landscape management company to complete landscape works. A competent landscape management company/companies will be used for the operational lifetime of the project to manage and maintenance of the green infrastructure features at the onshore substation.
	Reinstatement of habitats	Reinstating lost habitat ensures green infrastructure will be maintained in the long term.
	Monitoring of the mitigation measures post-construction.	Subsequent monitoring demonstrates a commitment to effectively implement, establish and maintain mitigation at all stages of the development process.
7 Brings Nature Closer to People	N/A	OnECC and onshore substation will be predominantly within private land with no PRoW, which restricts opportunities to bring people closer to nature.
8 Supports Equitable and Inclusive Places	N/A	OnECC and onshore substation will be predominantly within private land with no PRoW, which restricts opportunities to make the Onshore Development Area more equitable and inclusive.
9 Delivers Climate Resilient Water Management	Creation of SuDS	SuDS basin will result in sustainable drainage and benefits to flood management at the onshore substation.
10 Brings Water Closer to People	N/A	A SuDS basin will be created adjacent to the onshore substation which will create a new water habitat. However, the OnECC and onshore substation will be predominantly within private land with no PRoW, which restricts opportunities to bring people closer to water.

Standard	Mitigation included within the Proposed Project that aligns with the Standard	Justification for meeting the standard
11 Delivers Wildlife Enhancement	Reinstatement, improvement, and creation of habitats	The retention, improvement, and creation of new habitat overall provides wildlife benefits. The long-term management and maintenance of the green infrastructure features will be secured through a LEMP. This will ensure that the habitats are managed to promote the long-term success of the habitat and value to biodiversity. Any future incidence of INNPS noted at the onshore substation during operation will be controlled during habitat management through the LEMP.
12 Underpins Nature's Recovery	Protection of key habitat areas through use of HDD	Designated sites and watercourses that cross the OnECC will avoid being directly impacted by the proposed Project through the use of HDD (i.e. the OnECC will pass under these key habitats areas).
	Reinstatement, improvement and creation of habitats	Maintained, reinstated, improved, and created habitats will help sustain ecological networks within and outside of Onshore Development Area.
	Maintaining connectivity	Reinstatement of habitats and creation of native woodland, as for Standard 1, will maintain connectivity.

8.9 Pembrokeshire Green Infrastructure Assessment Aims

71. How the proposed Project has paid due regard to the aims of the Pembrokeshire Green Infrastructure Assessment is summarised in **Table 8F-3.**

Table 8F-3 Summary of Proposed Green Infrastructure and its Link to the Pembrokeshire Green Infrastructure Assessment

Aim	GI included within the Proposed Project that aligns with the Aim	Justification
Aim 1 – Create a setting for urban and rural prosperity	N/A	No opportunities within remit of proposed Project
Aim 2 – Enhance the visitor experience and economy	N/A	No opportunities within remit of proposed Project
Aim 3 – Build healthier communities	N/A	No opportunities within remit of proposed Project
Aim 4 – Maintain and enhance quality of place	Native woodland planting and earthwork bunds. Landscape Environmental Management Plan.	The native woodland planting and earthwork bunds will provide a multifunctional benefit by providing screening between the onshore substation and wider landscape. New planting will provide aesthetic value in a predominantly agricultural landscape. The long-term management and maintenance of the green infrastructure features will be secured through the LEMP.
Aim 5 – Ensure urban and rural areas are resilient to climate change	SuDs basin. Species-rich grassland.	SuDS basin will result in sustainable drainage and benefits to flood management at the onshore substation. Replacement of improved grassland with species-rich grassland around the onshore substation will improve the climate resilience of grassland habitat due to its greater species diversity.
Aim 6 – Protect and enhance biodiversity & natural networks	Mitigation measures. SuDs basin with native scrub planting. Native woodland planting. Species-rich grassland.	Mitigation measures as outlined in **Appendix 4A: Outline Construction Environmental Management Plan** and **Table 8F-1** will protect existing biodiversity within the Onshore Development Area. Habitats will be reinstated following the completion of the proposed Project. During the construction phase, gaps resulting from the temporary removal of hedgerows will be bridged by cut stems and branches on barrels to ensure connectivity is maintained for commuting bats and dormouse (should they be present).

Aim	GI included within the Proposed Project that aligns with the Aim	Justification
		Native woodland planting will compensate in part for the loss of the hedgerow near the onshore substation by being a distinct linear feature close to where the hedgerow will be lost.

8.10 Conclusion

72. Summaries of how the proposed Project has incorporated the following guidance are shown in the tables and sections detailed below:

- Step-Wise Approach to mitigation: **Section 8.7.13 and Table 8F-1;**
- DECCA framework to support ecosystem resilience: **Section 8.7.14 and Table 8F-1;**
- BwNSF to explore opportunities for green infrastructure: **Table 8F-2**; and,
- Pembrokeshire Green Infrastructure Assessment to align the proposed Project with the local vision for green infrastructure: **Table 8F-3.**

8.10.17. Summary of Net Benefits of Biodiversity

In summary, the proposed Project provides NBB predominantly through:

- Maintaining the extent and condition of habitats along the OnECC through avoidance and minimisation of impacts, and reinstating habitats lost along the OnECC, to avoid permanent loss;
- Incorporating biodiversity enhancements by improvements to the condition and diversity of habitats along the OnECC by increasing species-richness where habitats are reinstated; and,
- Increasing the diversity of habitats at the onshore substation by compensating for habitats lost by creating a SuDS basin with integrated locally native scrub, species-rich grassland, and native woodland planting.

ANNEX A – BASELINE CONDITIONS

[INSERT ANNEX A]

[INSERT ANNEX A]

[INSERT ANNEX A]

[INSERT ANNEX A]

ANNEX B - INDICATIVE MITIGATION LANDSCAPE PLAN

[INSERT ANNEX B]

ANNEX C SUMMARY OF LEGISLATION AND POLICY

8.10.18. Legislation

73. The UK is no longer a member of the European Union (EU). EU legislation as it applied to the UK on 31 December 2020 is now a part of the UK domestic legislation. EU legislation which applied directly or indirectly to the UK before 11.00pm on 31 December 2020 has been retained in UK law as a form of domestic legislation known as 'retained EU legislation'.

74. The Secretary of State for the Environment, Food and Rural Affairs and Welsh Ministers have made changes to parts of the Conservation of Habitats and Species Regulations 2017 (referred to as the 2017 Regulations) so that they operate effectively. Most of these changes involve transferring functions from the European Commission to the appropriate authorities in England. All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant.

Designated Site

Internationally Designated Sites

75. These sites in the UK no longer form part of the EU's Nature 2000 ecological network. The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (referred to as the 2019 Regulations) have created a national site network on land and at sea, including both the inshore and offshore marine areas in the UK. The national site network includes:

- Existing sacs and spas; and,
- New sacs and spas designated under these Regulations.

76. Any references to Nature 2000 in the 2017 Regulations and in guidance now refers to the new national site network.

77. Formal Appropriate Assessment is required to be undertaken by the competent authority before undertaking, or giving consent, permission or other authorisation for any work which are likely to have a significant effect on such a site.

Nationally Designated Sites

78. Under the Wildlife and Countryside Act 1981 (as amended), it is an offence to carry out or permit to be carried out any operations likely to damage a SSSI. These operations are listed in the SSSI notification.

79. Owners, occupiers, public bodies and statutory undertakers must give notice and obtain the appropriate consent under Section 28 of the Wildlife and Countryside Act 1981 (as amended), before undertaking operations likely to damage a SSSI.

Locally Designated Sites

80. Local Wildlife Sites (LWSs) are sites with 'substantive nature conservation value' and include SINCs. They are defined areas, identified and selected for their nature conservation value, based on important, distinctive, and threatened habitats and species within a region.

81. They are usually selected by the relevant Wildlife Trust, along with representatives of the local authority and other local wildlife conservation groups.

82. The LWS selection panel select all sites that meet the assigned criteria, unlike SSSIs which for some habitats are a representative sample of sites that meet the national standard. Consequently, many sites of SSSI quality are not designated and instead are selected as LWSs. LWSs can therefore be amongst the best sites for biodiversity.

Protected Species

Plants, Fungi, Mosses, and Liverworts

83. Under the Wildlife and Countryside Act 1981 the term 'plant' includes algae, lichens and fungi, mosses, liverworts and vascular plants.

84. It is unlawful to uproot (that is dig up or otherwise remove the plant from the land on which it is growing whether it has roots or not) any wild plant without permission from the landowner or occupier.

85. For plants listed under Schedule 8 of the Wildlife and Countryside Act 1981, it is illegal to intentionally pick, uproot or destroy the wild plant or any seed or spore attached to the wild plant.

Bats/Otter/Hazel Dormouse

86. These species, known as European Protected Species, are protected under Regulation 43 of the 2017 Regulations as amended. This makes it an offence to:

    - Deliberately capture, injure or kill an animal.
    - Deliberately disturb an animal; or,
    - Damage or destroy a breeding site or resting place used by an animal.
    - Deliberate capture or killing is taken to include 'accepting the possibility' of such capture or killing. Deliberate disturbance of animals includes in particular any disturbance which is likely to:
    - Impair their ability to survive, breed, reproduce or rear or nurture young;
    - In the case of animals of hibernating or migratory species, to hibernate or migrate; or,
    - Significantly affect the local distribution or abundance of the species to which they belong.

87. Where development works are at risk of causing one or more of the offences listed above, a mitigation licence from Natural Resources Wales can be obtained to facilitate the works that would otherwise be illegal.

88. These species are also protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). This makes it an offence to intentionally or recklessly obstruct access to any structure or place used for shelter or protection or disturb an animal in such a place.

89. Lower levels of disturbance not covered by the Conservation of Habitats and Species Regulations 2017 (as amended) remain an offence under the Wildlife and Countryside Act 1981 although a defence is available where such actions are the incidental result of lawful activity that could not reasonably be avoided.

Nesting Birds

90. All wild birds are protected under the Wildlife and Countryside Act 1981 (as amended), with some species afforded great protection under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). In addition to the protection from killing or taking that all birds receive; Schedule 1 birds and their young must not be disturbed at, or in the vicinity of the nest.

91. There are no licensing purposes that explicitly cover development activities affecting wild birds.

92. Common Species of Reptile (common lizard, slow worm, grass snake and adder)

93. Common species of reptile are protected against intentional killing and injury under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). There is no requirement for a licence where development works affect common species of reptiles. Instead, Natural Resources Wales advise that where reptiles are present, they should be protected from any harm that might arise during the development works through appropriate mitigation.

Badger

94. Badgers and their setts are protected under the Protection of Badgers Act 1992 (as amended). This makes it an offence to:

- Wilfully kill, injure or take a badger;
- Intentionally or recklessly damage, destroy or obstruct access to a badger sett; or,
- Disturb a badger in its sett.

95. It is not illegal to carry out disturbance activities near setts that are not occupied, i.e. those that do not show signs of current use.

96. Where required, licences for development activities involving disturbance or sett interference or closure are issued by Natural Resources Wales. Licences for activities involving watercourse maintenance, drainage works, or flood defences are issued under a separate process.

97. When assessing the requirement for a licence in respect of development, Natural Resources Wales state that badgers are relatively tolerant of moderate levels of noise and activity around their setts, and that a low or moderate level of apparent disturbing activity at or near to badger setts does not necessarily disturb the badgers occupying these setts.

98. Licences are normally not granted from December to June inclusive (the badger breeding season) because dependent cubs may be present within setts.

Species and Habitats of Principal Importance for the Conservation of Biodiversity

99. Section 7 of the Environment (Wales) Act 2016 sets out the duty for public authorities to conserve biodiversity in Wales. Habitats and species of principal importance for the conservation of biodiversity are referred to in Section 7 of the Environment (Wales) Act 2016. The list can be found on the Natural Resources Wales website, and includes a range of invertebrates, birds, and common toad.

100. The list is used as a guide for decision makers such as public bodies, including local and regional authorities, in implementing their duty under Section 7 of the Environment (Wales) Act 2016 to have regard to the conservation of biodiversity in Wales when carrying out their normal functions.

Hedgerows

101. Under the Hedgerow Regulations 1997, it is against the law to remove or destroy certain hedgerows without permission from the local planning authority. In general, permission will be required before removing hedges that are at least 20 m in length, over 30 years old and contain certain species of plant. The local planning authority will assess the importance of the hedgerow using criteria set out in the regulations.

Invasive Non-Native Plant Species

102. Under the Wildlife and Countryside Act 1981 (as amended), it is an offence to plant or otherwise cause species listed under Schedule 9 Part II to grow in the wild.

103. Species listed on Invasive Alien Species of Union concern under the Invasive Alien Species (Enforcement and Permitting) Order 2019 are subject to restrictions and measures set out in the Regulation. These include restrictions on keeping, importing, selling, breeding, growing and releasing into the environment.

104. Any contaminated soil or plant material is classified as controlled waste and should be disposed of in a suitably licensed landfill site, accompanied by appropriate Waste Transfer documentation, and must comply with section 34 of the Environmental Protection Act 1990.

Environment Act 2021

105. Two years after it was first introduced in October 2019, the UK Government's Environment Bill received Royal Assent on 9 November 2021. The Bill was introduced to support the Government's overarching vision for leaving the environment in a better state for the next generation, including transposing elements of the UK Government's 25 Year Environment Plan into statute and confirming the UK's approach to environmental governance post-Brexit. Key provisions of what is now the Environment Act 2021 include:

- The creation of a new post-Brexit environmental watchdog (the Office for Environmental Protection).
- Establishing an over-arching scrutiny framework for the environment.
- A new "comply or explain" mandate on deforestation for UK businesses.
- A new direction for resources and waste management.
- The setting of air quality targets including for fine particulate matter.
- A requirement to reduce sewage discharges and forthcoming prohibitions of selected single-use plastic items.

106. This Act has now been given Royal Assent but is not yet in force at the time of writing this report.

8.10.19. Planning Policy

Planning Policy Wales, 2024

107. PPW sets out the land use planning policies of Welsh Government. It is supplemented by a series of TANs, Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national planning policy framework for Wales.

108. Chapter 6. Distinctive and Natural Places outlines Welsh Government's objectives for the environmental and cultural components of placemaking. These components are complementary to those of the Active and Social and Productive and Enterprising themes and collectively the three themes come together to contribute towards the national sustainable placemaking outcomes.

109. The Environment (Wales) Act 2016 Part 1 – Section 6 'Biodiversity and resilience of ecosystems duty' states that public authorities "must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions". PPW (Welsh Government, 2024) expands on this by stating that "This means development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity".

110. To facilitate the fulfilment of Section 6, a NBB approach has been adopted by the Welsh Government. This approach has been included in the 12th edition of PPW (Welsh Government, 2024) and sets out the requirement for a Green Infrastructure Statement. Relevant sections of PPW are:

111. Paragraph 6.2.11: The quality of the built environment should be enhanced by integrating green infrastructure into development through appropriate site selection and use of creative design. With careful planning and design, informed by an appropriate level of assessment, green infrastructure can embed the benefits of biodiversity and ecosystem services into new development and places, help to overcome the potential for conflicting objectives, and contribute to health and well-being outcomes.

112. Paragraph 6.2.12: A green infrastructure statement should be submitted with all planning applications. This will be proportionate to the scale and nature of the development proposed and will describe how green infrastructure has been incorporated into the proposal… The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question and must be used for demonstrating how the step-wise approach (see 'Method of Approach' below) has been applied.

113. Paragraph 6.2.13: There are multiple ways of incorporating green infrastructure, depending on the needs and opportunities a site presents, and the green infrastructure assessment should be referred to, as appropriate, in order to ascertain local priorities… In most cases the green infrastructure statement should highlight any baseline data considered and surveys and assessments undertaken, including but not limited to, habitats and species surveys, arboricultural surveys and assessments, sustainable drainage statements, landscape and ecological management plans, open space assessments and green space provision and active travel links.

114. Section 6.4 addresses Biodiversity and Ecological Networks. The policy includes the duties and requirements set out in Section 6 the Environment Wales Act (2016) and pays due regard to the State of Natural Resources Report (NRW, 2016) by taking all reasonable steps to maintain and enhance biodiversity. There is a focus on ecosystem services and the benefits of protecting and enhancing biodiversity.

115. The relevant measures in place to conserve landscape and biodiversity include:

- Statutory designations;
- Non-statutory designations;
- Maintaining and enhancing biodiversity;
- Ecosystem resilience and connectivity of ecological networks; and,
- Protection and consideration of protected and notable species and habitats.

116. Sections relevant to this Green Infrastructure Statement are detailed below.

117. Paragraph 6.4.5: Planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means development should not cause any significant loss of habitats or populations of species (not including non-native invasive species), locally or nationally and must work alongside nature and it must provide a net benefit for biodiversity and improve, or enable the improvement, of the resilience of ecosystems. A net benefit for biodiversity is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before, through securing immediate and

long-term, measurable and demonstrable benefit, primarily on or immediately adjacent to the site. The step-wise approach outlined below is the means of demonstrating the steps which have been taken towards securing a net benefit for biodiversity. In doing so, planning authorities must also take account of and promote the resilience of ecosystems, in particular the following attributes, known as the DECCA Framework:

- Diversity between and within ecosystems;
- The extent or scale of ecosystems;
- The condition of ecosystems including their structure and functioning;
- The connections between and within ecosystems; and
- Adaptability of ecosystems including their ability to adapt to, resist and recover from a range of pressures likely to be placed on them through climate change for example.

118. Paragraph 6.4.21: Planning authorities must follow a step- wise approach to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimised, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.

119. Paragraph 6.4.12: Having worked iteratively through the stages of the step-wise approach (see 'Method of Approach' below), and providing evidence in the Green Infrastructure Statement that the step-wise approach has been followed, a scheme of enhancements must be provided to ensure a NBB. Where biodiversity enhancement proportionate to the scale and nature of the development is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise, it will be necessary to refuse permission.

120. Paragraph 6.4.13: Improving ecosystem resilience, particularly improving connectivity to the immediate surroundings, would be a key contribution to on-site avoidance, minimisation, and mitigation strategies and enhancement. How a development would improve the attributes of resilience should be demonstrated as far as this is reasonably practical.

121. Paragraph 6.4.20: Statutorily designated sites must be protected from damage and deterioration, with their important features conserved and enhanced by appropriate management. The contribution of the designated site to wider resilient ecological networks should be recognised and captured as part of a strategic approach to planning policy and decision making. The links between planning and wider management activity for the restoration and recovery of nature should be made. Complementary, and joint, action between all sectors and beyond the boundaries of the designated sites themselves is necessary to improve extent, connectivity and adaptability and address the nature emergency.

122. Paragraph 6.4.29: SACs and SPAs are of European importance. Under the Conservation of Habitats and Species Regulations (2017) (the Habitats Regulations), all public bodies (including planning authorities) must have regard to the requirements of the EC Habitats and Birds Directives when carrying out their functions. SACs and SPAs on land are underpinned by notification as SSSIs and hence subject to protection afforded by the SSSI provisions. Before authorising development or adopting a land use plan which is likely to have a significant effect on a SACor SPA (including where outside the boundary of the SAC or SPA), planning authorities must carry out an appropriate assessment of the implications for the designated features,

consult NRW and have regard to NRW's representations. The development can normally only be authorised, or the plan adopted, if the planning authority ascertains that it will not adversely affect the integrity of the site, if necessary taking into account any additional measures, planning conditions or obligations.

123. Paragraph 6.4.31: Although non-statutory designations do not have a statutory process for their protection, Sites of Importance for Nature Conservation, Local Wildlife Sites, Local Nature Reserves, and Regionally Importance Geodiversity Sites make a vital contribution to delivering an ecological network for biodiversity and resilient ecosystems, and they should be given protection in development plans and the development management process.

124. Paragraph 6.4.35: The presence of a species protected under European or UK legislation, or under Section 7 of the Environment (Wales) Act 2016 is a material consideration when a planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat and to ensure that the range and population of the species is sustained.

125. Paragraph 6.4.39: Planning authorities should protect trees, hedges, groups of trees and areas of woodland where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial green infrastructure function.

126. Paragraph 6.4.26: Ancient woodland, semi-natural woodlands, individual ancient, veteran and heritage trees and ancient hedgerows are irreplaceable natural resources, and have significant landscape, biodiversity and cultural value. Such trees, woodlands and hedgerows are to be afforded protection from development which would result in their loss or deterioration unless very exceptionally there are significant and clearly defined public benefits; this protection must prevent potentially damaging operations and their unnecessary loss.

127. Paragraph 6.4.44: the protection and planting of trees and hedges should be delivered, where appropriate, through locally specific strategies and policies, through imposing conditions when granting planning permission, and/or by making Tree Preservation Orders (TPOs).

Technical Advice Note 5 (TAN5) Nature Conservation and Planning

128. The PPW is supplemented by a series of TANs. TAN 5 provides guidance on how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation. It provides advice on areas including the key principles of positive planning for nature conservation, nature conservation in Local Development Plans and development management procedures. It also provides advice on development affecting designated sites and habitats, in addition to protected or habitats and species of principal importance.

129. Key Principles include that the town and country planning system in Wales should integrate nature conservation into all planning decisions; that the town and country planning system should look for development to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally and that they should ensure that the UK's international and national obligations for site, species and habitat protection are fully met in all planning decisions.

The National Plan

130. The National Plan 20247 sets out Wales' national development framework that details the Welsh Government's twenty-year plan for shaping the growth and development of the

country. Relevant to this Green Infrastructure Statement is Policy 9 – Resilient Ecological Networks and Green Infrastructure which is outlined below:

131. To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:

132. identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and

133. identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being.

134. Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, nature-based approaches to site planning and the design of the built environment.

Local Planning Policy

135. A summary of relevant local planning policies from the Pembrokeshire County Council Local Development Plan (Pembrokeshire Biodiversity Partnership, 2011) is provided in Table 9-1 below.

Table 9-1 Summary of Local Planning Policy

Planning Policy	Purposed/Relevant Sections
SP 1 Sustainable Development	All development proposals must demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised. This and associated policies focus on ensuring that: proposals are appropriate in scale and nature for different locations; and the design achieves safe, attractive and inclusive environments which are sustainable and optimise energy use and efficiency and incorporate renewable energy technologies where feasible, whilst addressing landscaping and infrastructure requirements of any development.
SP 16 The Countryside	The essential requirements of people who live and work in the countryside will be met whilst protecting the landscape and natural and built environment of Pembrokeshire and adjoining areas. Pembrokeshire and its wider context, has a range of important environments and landscapes, some of which are shown on the Proposals Maps as nature designations. In addition to the specific environments that are protected by a range of designations, there are a number of non designated landscapes, woodlands, hedgerows, trees and species that occur across the Plan area and contribute to making Pembrokeshire a special place. Some of the species found in Pembrokeshire are of significant value to the area's

Planning Policy	Purposed/Relevant Sections
	ecology including European protected species such as bats, otters, dormice and the marsh fritillary butterfly.
GN 1: General Development Policy	Development will be permitted where the following criteria are met: 1. The nature, location, siting and scale of the proposed Project is compatible with the capacity and character of the site and the area within which it is located; 2. It would not result in a significant detrimental impact on local modified in terms of visual impact, loss of light or privacy, odours, smoke, fumes, dust, air quality or an increase in noise or vibration levels; 3. It would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities; 4. It respects and protects the natural environment including protected habitats and species; 5. It would take place in an accessible location, would incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network; 6. Necessary and appropriate service infrastructure, access and parking can be provided; 7. It would not cause or result in unacceptable harm to health and safety; 8. It would not have a significant adverse impact on water quality; and 9. It would neither contribute to the coalescence of distinct settlements nor create or consolidate ribbon development. Pembrokeshire's natural and built environment will be protected from inappropriate development and, where possible, enhanced. Urban and rural woodland, tree cover and hedgerows contribute to the visual quality and diversity of the landscape, to recreational and educational opportunities and to substantive environmental benefits such as additional or enhanced priority habitats and feeding grounds, shelter, shade, improved carbon capture, ameliorating microclimates and improving air quality. Development proposals should utilise the natural features of a site. Development that would impact upon trees, woodland and/or hedgerows will require an arboricultural survey and should aim to retain and adequately protect these features prior to, during and after development. Prospective developers of schemes that may impact upon Ancient or Semi-Natural Woodland should consult the Ancient Woodland Inventory66 prior to any disturbance of a site. The Local

Planning Policy	Purposed/Relevant Sections
	Planning Authority will consult with CCW prior to authorising development on sites affecting Pembrokeshire County Council Local Development Plan - Adopted 2013 Chapter 6 – General Policies Ancient or Semi-Natural Woodland.
GN 2 Sustainable Design	Development will be permitted where relevant criteria are met, including contributing to delivering well-designed outdoor space with good linkages to adjoining streets, spaces and other green infrastructure.
GN 35 Protection of Open Spaces with Modified Value	Development which would adversely affect the appearance, character or local modified value of areas of public and private open space will not normally be permitted. In exceptional circumstances, where the proposal will bring clear social and/or economic benefits to the local community and make a positive contribution to the built environment, development may be permitted where it can be demonstrated that no suitable alternative site is available. This policy seeks to protect open space which has local modified value, for example because of its appearance or character. Such spaces can be gardens, civic spaces, cemeteries, green corridors, green spaces around buildings, village greens and land which establishes the setting for a settlement. Proposals for the development of modified open spaces must demonstrate that no suitable alternative site for the development can be found and that the proposed loss of open space/natural features has been minimised.
GN 37 Protection and Enhancement of Biodiversity	All development should demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity. Development that would disturb or otherwise harm protected species or their habitats, or the integrity of other habitats, sites or features of importance to wildlife and individual species, will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures. The protection and enhancement of biodiversity is fundamental to the high environmental quality of Pembrokeshire. Planning proposals that affect internationally, nationally, regionally and locally designated sites, shown on the Proposals Map, are a material consideration when considering a development proposal and will be assessed in accordance with national planning policy and guidance, working with stakeholders and statutory consultees, and using appropriate data sources. Development proposals with potential for adverse effect on internationally or nationally important sites will require detailed assessment before progressing. Specifically if any development proposal is likely to have a significant effect on a European site or species it shall be subject to an Appropriate Assessment of the implications in relation to the site's conservation objectives.

Planning Policy	Purposed/Relevant Sections
	This policy aims to ensure that species and their habitats in countryside and urban environments are protected from the potentially adverse effects of development, and where possible enhanced. Potentially adverse effects may include disruption to species and habitats prior to, during and/or after construction, or the cumulative impacts of a development, for example unacceptable noise, lighting or traffic impacts. This policy aims to protect against such adverse effects and therefore mitigation and/or enhancement may be required as an integral part of a development proposal. This policy also aims to protect and maintain ecological connectivity corridors and 'stepping stone' habitats, such as road verges, gardens, rivers and green spaces, and where possible to extend these in order to safeguard biodiversity and habitats and prevent their fragmentation and/or species isolation. The principles underpinning this policy lie at the heart of the Pembrokeshire LBAP and the concept of sustainable development. The LBAP identifies priority species and habitats considered to be of national, regional and local importance which this policy aims to protect. Due regard is also given to the Natural Environment and Rural Communities (NERC) Act (2006) Section 42 List of "Species and Habitats of Principal Importance for Conserving the Biological Diversity of Wales". Only in exceptional circumstances will development proposals that detrimentally impact upon such species and/or their habitats be permitted, and in such circumstances the effects must be mitigated through careful design or work scheduling. Translocation is seldom successful in sustaining the nature conservation interest of affected habitats and should not be used to support a proposal which would otherwise be unacceptable.

136. Furthermore, the Local Biodiversity Action Plan for Pembrokeshire (LUC, 2023) is a material consideration in this application or planning permission. It provides the framework for habitat and species conservation in Pembrokeshire It is aimed at organisations, businesses, groups and individuals, which are either working to protect and enhance biodiversity in the city, or who may impact on it in some way.

Pembrokeshire Green Infrastructure Assessment

137. The Pembrokeshire Green Infrastructure Assessment (LUC, 2023) provides 'a suite of ambitious and deliverable management interventions with the aim of creating healthier, more resilient environments across the county'. The document recognises green infrastructure as the cornerstone of sustainable development that provides multi-functional benefits to communities and the environment. The inclusion of green infrastructure in development should be assessed by setting the baseline, identifying priorities, conducting a site assessment, identifying opportunities, and ensuring and monitoring/review. While the document focuses on the major urbanised areas of Pembrokeshire, it provides a framework for green infrastructure assessment across all of Pembrokeshire.

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